

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Title V proposed/final permit No. V-98-032
LEESTOWN COMPANY, INCORPORATED
Frankfort, Kentucky
May 4, 2000
Danny Ballard
Plant I.D. # 102-1320-0009
Application Log # F470

SOURCE DESCRIPTION AND CONTROL EQUIPMENT:

- E. Unit 01: Grain and distiller's dried grain handling: grain unloading/receiving hopper with enclosure, conveyors, bucket elevators, distiller's dried grain loading rack
- E. Unit 02 Hammermill and receiver cyclone
- E. Unit 03 Fermentation process
- E. Unit 04 Rotary dryer with cyclone
- E. Unit 05 Three rotary dryers and cyclone
- E. Unit 06 Barrel filling, aging, dumping
- E. Unit 07 Processing and bottling operations: holding, processing, and bottling tanks, bottle filling and pipeline components and peripheral equipment
- E. Unit 08 Horizontally-opposed waste-oil-fired indirect-heat-exchanger
- E. Unit 09 Spreader stoker coal-fired indirect-heat-exchanger
- E. Unit 10 Horizontally-opposed waste-oil-fired indirect-heat-exchanger
- E. Unit 11 Wastewater Treatment Process
- E. Unit 12 Cooling tower

REGULATION APPLICABILITY:

All the applicable regulations to the emission units are listed in the permit. The following regulations are not applicable based on the applicability date of regulation or unit size:

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Regulation not applicable to Emission Unit 07 due to applicability date:

Regulation 401 KAR 60:480, Standards of performance for equipment leaks of VOC in the synthetic organic chemicals manufacturing industry, incorporating by reference 40 CFR 60.482, Subpart VV, applicable to VOC leaks in affected facilities that commenced construction or modification after January 5, 1981.

Regulations not applicable to Emissions Units 09, 10, and 11 due to applicability date and/or size of unit:

Regulation 401 KAR 60:042, Standards of performance for industrial-commercial-institutional steam generating units, incorporating by reference Title 40 CFR, Part 60, Subpart Db, applicable to an emissions unit of greater than 100 MMBtu/hour and constructed after June 19, 1984

Regulation 401 KAR 60:043, Standards of performance for small industrial-commercial-institutional steam generating units, incorporating by reference 40 CFR Part 60, Subpart Dc, applicable to an emissions unit with a design capacity of 100 MMBtu/hour or less and greater than or equal to 10 MMBtu/hour and constructed after June 9, 1989.

COMMENTS:

- The permittee has not proposed any alternate operating scenario for the emissions units.
- Unit 1 and Unit 13 are subject to fugitive emissions Regulation 401 KAR 63:010 and are considered to be in compliance when using control measures required by the regulation.
- In order to ensure non-applicability of Regulation 401 KAR 51:017, Prevention of Significant Deterioration of Air Quality, particulate, sulfur dioxide and nitrogen oxide emissions from emissions units 02, 04, 05, 08, and 10 shall not exceed 249 tons in any consecutive twelve month period. These units were previously limited under permit O-81-177.
- In order to ensure non-applicability of Regulation 401 KAR 51:017, Prevention of Significant Deterioration of Air Quality, sulfur dioxide and nitrogen oxide emissions from emissions unit 09 shall not exceed 249 tons in any consecutive twelve months period. This boiler was previously limited under permit O-81-177.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.